

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF
PENNSYLVANIA

Craig Boston, prose

17 5124

VS.

Prim Care Medical Inc.,
Nurse Jessica, Nurse Alynn,
Nurse Pam

COMPLAINT

1. Boston, prose, is an inmate at Bucks County Correctional Facility, 1730 S. Easton Rd. Doylestown PA 18901. A citizen of the United States.
2. Prim Care Medical Inc., is a medical provider contracted by the Bucks County Correctional Facility [Official Compacity]. Dialogue can be established with the provider through B.C.C.F. 1730 S. Easton Rd. Doylestown PA, 18901.
- 3) Nurse Jessica is a supervisor of employees contracted to B.C.C.F., and in charge of overseeing that proper care is provided [Indivisual Compacity] 1730 S. Easton Rd. Doylestown PA, 18901.

4. Nurse Alynn, is a supervisor of employees contracted to B.C.C.F., and is also in charge of overseeing that proper care is provided [Individual Compacity].
1730 S. Easton Rd. Doylestown PA, 18901.
5. Nurse Pam is a medical nurse for Prim Care Inc., an agency contracted to B.C.C.F. [Individual Compacity].
1730 S. Easton Rd. Doylestown PA, 18901.
6. Boston is filing his claim [redacted] in Federal court under the Civil Rights Act, 42 U.S.C. § 1983 [Prisoner Complaint], for inadequate medical care and negligence. Deprivations of 8th Amendment rights secured by the United States Constitution. He presents the following:
7. On Sept. 21, 2017 Boston was relieved of his job as block worker where he live on the Mental Health Block, and placed on Administrative lock for reasons undisclosed to him. He refused to eat in protest. On Sept. 25, 2017 Boston was moved to the Restricted Housing unit Cell #3. Though medical personnel had been informed by mental health doctor, Dr. Cassidy, they refused to treat him by monitoring his B.M.I [Body Mass Index] and testing vitals, against there own policy. Due to Boston's habitual habits of protesting with hunger. On Sept. 27, 2017, 7 days later, about 5:45 pm. Boston was found unresponsive and not breathing on his cell floor by Officer Prince. Prim Care Medical Inc., is an

agency contracted to B.C.C.F., employees: Nurse Jessica, and Nurse Alynn, are in charge of assigning proper care.

Camera footage, Inmate regular watch forms, and movement charts corroborate Boston's claim.

- 8 On Sept. 27, 2017 about 5:45 p.m. medical personnel responded to Officers Prince's call for medical response. Procedures were used on Boston to induce breathing. After regaining conscious he went into a severe period of hyperventilation. In which his face, hands, and toes contorted, his breathing was severely labored and he could not move. Both auditory and visual functioning ~~was~~^{worked} normally. Supervising Nurse Jessica, with the intent to deliberately shield her negligent responsibilities to oversee proper medical care is provided, omitted information to responding E.M.T.'s transporting the patient, that were vital in the circumstance. In those seven days Boston had lost 16 lbs. Prim Care is an agency contracted to B.C.C.F., Nurse Jessica works for Prim Care Inc. Camera footage, Correctional Officers & Nurses, corroborate Boston's claims.

- 9 On Oct. 9, 2017, Boston hadn't eaten for a total of twenty days. He complained to Correctional Officer Williams that he had thrown up bile and had a migraine. Boston related to the officer that he attempted to take a tylenol and couldn't swallow. He was taken to medical. After Boston explained that he was in distress and couldn't swallow, Nurse Pam became visibly upset. Stating, "I thought you couldn't swallow because you weren't eating."

Boston explained that he wasn't eating but could always swallow.

Nurse Pam began to question who gave him the tylenol because it wasn't prescribed. He stated that, "they were prescribed, and did it really matter, ~~was~~ she going to address his issue or badger him about tylenol." Nurse Pam, very angrily, told the officers to take him back to his cell, though his heart rate was very high, as well, his blood pressure was elevated.

Nurse Pam never examined or address him being unable to swallow. Boston had lost 25 lbs by then and couldn't hydrate himself.

Nurse Pam is employed by Prim Care Medical Inc., an agency contracted to B. C. C. F. Correctional Officers and medical staff can corroborate the claims.

10. On Oct. 10, 2017, Boston wrote a request slip to the warden addressing his current affairs with the medical department. On Oct, 11, 2017 the warden responded that per medical he had never stopped breathing and suffered no distress. Supervising Nurse Jessica again, with the intent to shield her negligent ~~responsibilities~~ ~~responsibilities~~ to oversee that adequate care is given, omitted information from the Warden, and information from medical records.

Request slips, camera footage, nurses, and officer who physically had to clothes Boston corroborate the claim. Prim Care Medical Inc., is an agency contracted to the Bucks County Correction Facility. Nurse Jessica works for the medical provider.

11. Witnesses to the claims are: Nurse Nadine, Nurse Ranae, C/o Prince, C/o Booker, C/o C. Clark, C/o Sergeant Gaunt,

Sergeant Kovach, Sergeant Whitecell, C/o Nichols,
C/o Norman, C/o Lt. Clayton,

- 12 Boston has suffered mental anguish. Physical pain and migraines. Traumatic depression. And continued offenses to his rights to adequate medical attention, including a complete annual exam he hasn't received.

Wherefore, Boston respectfully requests the all parties be held accountable for there acts. He requests that a non-internal force be appointed to over see that medical attention is provided in a fair and adequate way. He requests monetary amount of \$100,000 be rewarded for his Traumatic depression. \$300,000 for mental anguish & psychological distress, \$500,000 for pain and suffering, and the habitual isolations of medical treatment in response to his unpleasant mental illness.

Respectfully Submitted
11/5/17

Craig Boston, prose
Craig Boston
1730 S. Easton Rd.
Doylestown, PA, 18901

120746

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Boston, Craig

Date

10/12/17

Module and Cell Number

MHU#13

Admission Date

8/12/16

I would like to see Business Administration.

I need to see that staff person because Yes I've written you before requesting two copies of the last six months of my account because I need it to file a waiver to withdraw filing fee prepayment. Could you please see to it that I receive those. Thank you very much.

Craig Boston
Signature of Inmate

Do Not Write Below This Line

Date request answered:

10/16/17

Answer:

We do not provide print outs.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

Business Office

120746

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Boston, Craig

Date

10/10/17

Module and Cell Number

RHU#3

Admission Date

8/12/16

I would like to see

Business Office.

I need to see that staff person because

Hi my name is Craig, I'm in the process of trying to waive a filing fee for my ~~appeal~~ federal court, and a sanction appeals filing fee. In order to bypass I need 2 copies of my last 6 months account record along with the motion to proceed without prepayment that I'm in the process of filing. Could you please have those two copies delivered to me.

THANK YOU very, very, much.

Craig Boston

Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

Business Office does not provide account statements. Please provide the proper paperwork and we will determine if we can complete it.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

Bus Office